

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-07-003

NRE Acquisition Co LLC – VMV Paducahbilt

Paducah, Kentucky 42003

April 24, 2008

Rick Shewekah, Reviewer

SOURCE ID: 21-145-00019

SOURCE A.I. #: 3077

ACTIVITY ID: APE20040002

SOURCE DESCRIPTION:

The facility specializes in the remanufacture and overhaul of locomotives. Activities at the facility include surface coating operations, steel shot blasting to clean metal parts, sand blasting of locomotive parts and engines, equipment welding, heat treatment of handrails, degreasing operations and testing of locomotive engines. The facility is also equipped with three small industrial boilers (each less than 250 MM Btu/hr), and various insignificant activities. The company name and ownership was changed on July 1, 2002 from VMV Enterprises, Inc. to NRE Acquisition Co LLC – VMV Paducahbilt.

This source has been operating pursuant to the requirements of current permit F-99-013, Revision 2, issued November 12, 2001. The permittee submitted a request for renewal of their existing Conditional Major operating permit on June, 14, 2004. As such, this permit is the renewed issuance of the source's plant-wide Conditional Major operating permit.

PUBLIC AND U.S. EPA REVIEW:

On February 29, 2008, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in the *Paducah Sun* in Paducah, Kentucky. In addition, notification of the issuance of the draft permit was sent to the U.S. EPA and affected states, Illinois, Missouri and Tennessee on March 2, 2008 via e-mail. The public comment period expired 30 days from the date of publication.

Comments were received from NRE Acquisition Co LLC on March 24, 2008. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

ATTACHMENT A

Response to Comments

Comments on NRE Acquisition Co LLC – VMV Paducahbilt Draft Conditional Major Air Quality Permit submitted by Kent Hall, Director – Quality, Environmental, Health & Safety. NRE presented their draft permit comments in a tabular format. Attachment B to this document present the full table of NRE’s comments. The following provides a summary of the comments, grouping similar comments as applicable, and the Department’s response to each comment. All page numbers listed are in reference to the Draft permit issued on February 29, 2008.

Permit Application Summary Form

1. Source Description – Ownership change should be July 1, 2002, not 2003.

Division’s response: Comment acknowledged, change made.

Permit Statement of Basis (SOB)

2. Page 1, Source Description – Ownership change should be July 1, 2002, not 2003.

Division’s response: Comment acknowledged, change made.

3. Page 6, Periodic Monitoring, paragraph b – Qualitative visible observations should be monthly, not weekly.

Division’s response: See related response to this comment at Comment 30 below.

4. Page 6, Periodic Monitoring, paragraph d - Not sure what emission point E06 should be, the rotoblast, and not sure about the ability to visually inspect the unit.

*Division’s response: Emission point E06 is incorrect; instead, SOB page 6, paragraph d, should reference two (2) emission points, EP21 (i.e., painting of locomotive insides and other painting outside of permanent booths) and EP25 (i.e., painting of locomotive parts). In initial Conditional Major (CM) permit No. F-99-013 (Revision 2), **1. Operating Limitations** required that the respective filters for both emission points be replaced when determined to be inefficient “as determined through visual inspection”; however, no corresponding requirement for frequency of inspection was included in the permit. As such, an enforceable condition specifying that the visual inspection be performed once per shift has been included at **4. Specific Monitoring Requirements**. The SOB is revised to correctly reference EP21 and EP25.*

Title V Permit

5. Page 2, Unit 01/Description – The description should indicate 0.75 lbs PM captured/lb PM used rather than 0.25 lbs PM captured/lb PM used.

*Division’s response: The Division inadvertently transposed the efficiencies and concurs with the comment. The permit is revised as suggested by the permittee. Related condition **2. Emission Limitations**, Compliance Demonstration Method, is similarly revised at the related compliance equation.*

6. Page 7 for EP04 (VMV06) Rotoblaster: Condition **1.c Operating Limitations** incorrectly specifies the pressure drop range as 0.7 psi and 0.11 psi, when it should be 0.07 psi and 0.11 psi.

Division's response: Comment acknowledged, change made.

1. Page 8 for EP04 (VMV06) Rotoblaster: Condition **4.b Specific Monitoring Requirements** indicates a pressure drop reading frequency of once per 8 hours of operation, while the existing conditional major permit indicates a frequency of once per shift.

Division's response: Although a standard work shift is equivalent to an 8-hour period, such is not always the case. Therefore, the Division agrees the once per shift frequency is appropriate, as the affected equipment should be evaluated at the end of its use cycle. Therefore, this condition, as well as the similar monitoring conditions for EP03, EP09, and EP19, are revised as requested.

7. Page 12 for EP06 (VMV11) Arcwelding: Condition **2. Emission Limitations, Compliance Demonstration Method**, paragraph c, specifies an emission factor of 38.4 lbs PM/1000 lb of welding wire used. We request a minor typographic correction, and use of a 9.6 lb PM/1000 lb factor we currently use for monthly emission calculations.

Division's response: Comment acknowledged regarding typographic error, change made. With respect to the emission factor, the initial conditional major permit utilized the emission factor specified above, as reflected in this renewal permit. This emission factor is taken from AP-42. The permittee was contacted regarding this comment and has proposed to use AP-42 emission factors in accordance with the rod or wire utilize. Therefore reference to a specific emission factor has been replaced with reference to most current AP-42 emission factor.

8. Page 14 for EP07 (VMV15) Heat Treatment Furnace: Please remove the monthly VOC, PM, NOx, and HAP emission rate monitoring required at **4.b Specific Monitoring Requirements**. This is not required for any other natural gas fired emission point, and this is probably a carry-over from when the unit was diesel fuel fired.

Division's response: The Department agrees that the emission unit is characterized with a relatively small burner capacity. This notwithstanding, due to the fact that this source utilizes other natural gas fired units; and since the source has accepted voluntary limits on plant emissions such that the requirements of 401 KAR 52:020 (Title V Permitting) do not apply, the permittee must still account for the pollutant emissions attributable to this emission point. For ease of record keeping and monitoring, the permittee can assume the maximum potential to emit of each pollutant from this unit, evenly divided over a 12-month period, for purposes of assessing the monthly pollutant emissions. There is no change to this condition due to this comment. However, the emission point description is revised as the maximum capacity is incorrectly specified as 840,000 million British thermal units per hour (MMBtu/hr), and it is revised to be 840,000 Btu per hour.

9. Page 16 for EP08, Indirect Heat Exchangers: Condition **2.a Emission Limitations** expresses the particulate limit as a three hour average. It is requested the Department revise the condition to remove the compliance averaging period since only natural gas fuel is used.

Division's response: The use of a three hour averaging period, while not expressly stated in the

original CM permit, is implied since the permittee would be required to conduct three (3) one-hour tests if Method 5 emissions testing pursuant to 401 KAR 59:015, Section 8, is required. This notwithstanding, the permit does acknowledge compliance with the specified particulate emission limit when combusting natural gas fuel, and no testing is required. The demonstration of compliance derives from the use of EPA's AP-42 emission factors for natural gas combustion, as contained in the POC table prepared for this permit. There is no change to the permit due to this comment.

10. Page 16 for EP08, Indirect Heat Exchangers: Condition **2.c Emission Limitations** expresses the sulfur dioxide limit pursuant to 401 KAR 59:015(1)(c). It is requested the Department revise the condition since only natural gas fuel is used.

Division's response: The permit does acknowledge compliance with the specified sulfur dioxide emission limit when combusting natural gas fuel, and no testing is required. The SOB provides the basis for the emission limit. The above cited rule is applicable to gaseous fuels. The demonstration of compliance derives from the use of EPA's AP-42 emission factors for natural gas combustion, as contained in the POC table prepared for this permit. There is no change to the permit due to this comment.

11. Page 16 for EP08, Indirect Heat Exchangers: Condition **2. Emission Limitations** in the original CM permit specified the rule-related formulas used to determine the allowable particulate and sulfur dioxide emission limits. Why would this change? Also, offline hours are reported during compliance certification.

*Division's response: The method of determining the allowable emission limits have been moved to the SOB. The resultant allowable emission limits, however, are unchanged and remain in the permit. There is no change to this condition due to this comment. With respect to the hours of operation, the Division agrees that condition **4.b Specific Monitoring Requirements** is not required for purposes of demonstrating compliance with specified limits for this emission point. This condition is deleted from the permit.*

12. Page 19 for EP09 (VMV08) Train Locomotive Spray Booth: **Condition 2. Emission Limitations**, *Compliance Demonstration Method*, paragraph d, incorrectly uses the transfer efficiency as the amount of paint applied; instead, this term should be one minus the amount of paint applied. Please correct the equation.

Division's response: Comment acknowledged, change made as requested. This comment also applies to EP09, EP19, EP20, EP21, and EP25, so a similar correction has been made to Section B for each of these emission points.

13. Page 19 for EP09 (VMV08) Train Locomotive Spray Booth: The compliance demonstration formula specified includes paint recovery for this individual paint booth. A paint recovery term is likewise included in the similar Section B compliance demonstration formulas for EP EP19, EP20, EP21, and EP25. This compliance method will require segregation of paint waste by coating booth and will require sampling of waste from each area separately. This method also will greatly increase operating costs. The existing conditional major provides a similar paint recovery term in the computation of pollutant emissions from these coating units, but allows for such computation as a source-wide recovery term rather than a per booth term. We request that

the requirement for paint recovery reflect the existing conditional major permit. Further, we believe that the requirement to subtract the particulate component attributable to source paint recovery as unnecessary and request that such reduction apply only to source emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs).

Division's response: The Division agrees with the request to compute the emissions attributable to paint recovery on a source-wide basis, consistent with the original permit. Determining the emissions reduction due to paint recovery on a per booth basis is not required for purposes of regulatory compliance. Therefore, Section B to each of the above referenced emission points is revised to remove the individual booth recovery computation, with a similar compliance formula added to Section D.4 for the source. However, with respect to the request to apply such source-wide formula only to VOC/HAP, and not to particulate, the Division does not agree and such formula is included in Section D.4 for particulate matter, consistent with the original permit. The permittee is not obligated to utilize this emissions reduction term and, instead, can assume no paint recovery for a particular compliance period.

14. Page 19 for EP09 (VMV08) Train Locomotive Spray Booth: The particulate control efficiency specified at 2. Emission Limitation, *Compliance Demonstration Method*, paragraph d. uses an incorrect control efficiency. Please correct this to be 0.9 lb PM captured / lb PM used.

Division's response: Comment acknowledged, change made as requested.

15. Page 20 for EP09 (VMV08) Train Locomotive Spray Booth: **Condition 5.a Specific Recordkeeping Requirements** may need clarification, as the spray booth has not been operated in many years.

Division's response: This condition already has language indicating that the permittee is not in operation during a given time period, the permittee shall make note of this fact. Since the permittee has not indicated EP09 will never be operated in the future, the condition remains unchanged.

16. Page 25 for EP10 Direct Heat Units - Natural Gas Usage: **Condition 5.b Specific Recordkeeping Requirements** has been added to the permit to require that records be maintained on all maintenance and necessary repairs. This condition was not in the initial conditional major permit and it is requested that the condition be deleted.

Division's response: Since there are no requirements applicable to these direct fired heaters, and since the source must comply with 401 KAR 50:055, Section 2(5), pursuant to Section E of the permit, the Division agrees with this request and the condition is deleted.

17. Page 28 for EP17 (VMV44 and VMV45) Dip Coating of Metal Parts: **Condition 4.b Specific Monitoring Requirements** is a requirement to monitor for NO_x and PM emissions. Since these pollutant emissions are attributable to natural gas combustion in the direct fired curing ovens, the monitoring requirements should be similar to those for EP 08.

Division's response: The Division agrees with the request to remove the requirement that the monthly VOC, PM, NO_x and HAP emissions be monitored, as emissions from source-wide natural gas combustion are accounted for in the source emission limitation at Section D.3.

18. Page 29 for EP18 (VMV122) Testing of Locomotive Engines: Condition **5.a Specific Recordkeeping Requirements** specifies a weekly and average daily fuel usage monitoring frequency. It is believed this should be monthly, consistent with the other monitoring requirements in the permit.

Division's response: Comment acknowledged, change made as requested.

19. Page 32 for EP20 (VMV105) Painting of engines and other parts: The description should be changed to indicate that construction occurred in 1999, not that it is projected to occur in 1999.

Division's response: Comment acknowledged, change made as requested.

20. Page 33 for EP20 (VMV105) Painting of engines and other parts: Conditions **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements** should be the same as those for EP25. Please revise these conditions.

Division's response: The requirement to perform pressure drop readings and maintain related records for EP20 is incorrect. The permittee has confirmed EP20 was not designed with, nor is equipped with, a pressure gauge. As such, compliance monitoring has been revised to be consistent with the original conditional major permit for EP20 to require daily filter inspection monitoring and recordkeeping. Clarifying language also is added to the conditions to ensure related material and pollutant emissions are monitored and recorded. These requirements are consistent with EP 25.

21. Page 36 for EP21 (PAU 1-4) Painting of locomotive insides and other painting outside of permanent booths: Please revise the monitoring requirement to be during operation of the painting operation.

Division's response: Comment acknowledged, change made as requested.

22. Page 36 for EP21 (PAU 1-4) Painting of locomotive insides and other painting outside of permanent booths: The recordkeeping requirement refers to a qualitative visible emission observation log, but such observations are not required for this emission point. Please revise clarify the recordkeeping requirement.

Division's response: The Division has removed the recordkeeping requirement as requested, since it is incorrectly included in the permit for this emission point. However, a requirement to record the daily filter inspection results has been added to permit, since inspections are a requirement for this emission point.

23. Page 38 for EP24 (VMV50) Blasting of locomotive parts: This emission point has been removed from the source, as indicated in the SOB. Please remove this emission point from the permit. Also, please delete reference to EP24 in Section D.3 for the source-wide emissions limitations.

Division's response: Comment acknowledged, change made as requested.

24. Page 41 for EP25 (SG-1) Painting of locomotive parts: The description incorrectly notes the application rate for Graco guns. Please revise to Devilblis HVLP rate at 14 gallons per hour

(GPH).

Division's response: Comment acknowledged, change made as requested.

25. Page 42 for EP25 (SG-1) Painting of locomotive parts: Please revise the monitoring requirement to be during operation of the painting operation.

Division's response: Comment acknowledged, change made as requested.

26. Page 47 for Section D.3, *Compliance Demonstration Method* for HAP emissions: The individual HAP calculation for welding should be revised to multiply by one minus the control efficiency, as indicated in Section B to EP06, and not the control efficiency as indicated.

Division's response: Comment acknowledged, change made as requested.

27. Page 48 for Section D.3, *Compliance Demonstration Method* for HAP emissions: The individual HAP calculation for natural gas combustion should be revised to correct the units for the AP-42 formaldehyde emission factor. The factor should be 0.075 lbs/10⁶ ft³ of natural gas fired.

Division's response: Comment acknowledged, change made as requested.

28. Page 48 for Section D.5.o, Source Recordkeeping Requirements: We request that the records for spray paint can usage be maintained in terms of the number of cans used, rather than the number of gallons of spray paint used.

Division's response: Paint usage in terms of the number of cans used is not indicative of the amount of paint used. There is no change to the condition due to this comment.

29. Page 51 for Section D.5.cc, D.5.dd, Source Recordkeeping Requirements, and Section D.6, Source Reporting Requirements: As indicated in the SOB, due to equipment removal at this source the potential to emit of CO is below the 100 ton per year TV threshold. However, the cited conditions incorrectly refer to source wide recordkeeping and reporting of CO emissions. It is requested that these requirements be removed from the permit.

Division's response: Comment acknowledged, change made as requested.

Title V Permit - Visible Emissions Opacity Monitoring Concern Group

30. Page 5 (EP 03 (VMV 117, VMV 118)); pages 10 and 11 (EP05 (VMV 09)), pages 18 and 20 (EP09 (VMV08)), pages 21 and 22 (EP09 (VMV126)), pages 30 and 31 (EP19 (VMV 124, VMV125)), page 33 (EP20 (VMV105)) and page 41 (EP25 (SG-1)): The Division has included in the permit a requirement to perform qualitative visual observations of the opacity of emissions for each of the specified emission points . This requirement was not in the original conditional major permit. We request these pages and the related conditions be revised to remove this condition.

Division's response: It is recognized that the requirement to conduct weekly qualitative visual observations was not a condition of the original conditional major permit. However, the emission

point opacity limitations specified in the original permit are included in this renewal permit. The Division has determined that routine inspections of the related control equipment, as specified in the permit, along with related parameter monitoring, i.e., weekly visual observations, is required to ensure proper operation of the process equipment and any control equipment, and compliance with the underlying opacity limits. There is no change to the permit at these emission points due to this comment.

31. Page 12 (EP06 - Arc Welding): Condition **4.b.ii Specific Monitoring Requirements** will require listing of operators who make the visible emission observations in addition to the Method 9 individuals previously tracks. It is requested we list only Method 9 individuals as in the original conditional major permit.

Division's response: The Division agrees with this request, but it is noted that the requirement is the same requirement as found in the existing permit. For purposes of greater clarity, the Division is indicating at 4.b.ii that the referenced individuals are those responsible for Method 9 observations.

32. Pages 22 and 23 (EP09 (VMV126); and page 31 (EP19 (VMV 124, VMV125)): Condition **6. Specific Reporting Requirements** requires documentation and submittal of a log of actions taken in response to an inspection of control equipment. Such an inspection is required when, after performing a qualitative visual observation, a Method 9 opacity observation is taken and the results indicate an exceedance of the opacity limit. It is unclear why this condition is in the permit renewal and it is instead requested that the requirements of the previous permit for this emission point be included in this renewal permit.

Division's response: The Division does not agree with this comment. It is the responsibility of the permittee to ensure they are compliant with all applicable requirements, including the specified opacity limitation. Proper operation of the process equipment and any control equipment is necessary to help ensure the limitations are met. To make this requirement enforceable as a practical matter, the need for documented inspections and repairs is deemed necessary. There is no change to the permit due to this comment, except Condition 6 on page 31 is revised to correctly reference the opacity condition as 2.a instead of 4.a as listed in the draft permit.

Title V Permit - Pressure Drop Monitoring Concern Group

33. Page 31 (EP19 (VMV 124, VMV 125), page 33 (EP20 (VMV105)), page 41 (EP25 (SG-1))): There were no gauges installed on these units from the manufacturer. We request that the new requirement in the renewal permit to monitor pressure drop at these emission points be eliminated as gauges were not in the design for these units.

Division's response: The requirements to perform pressure drop readings and maintain related records for the specified emission point are incorrect. The permittee has confirmed these emission point were not designed with, nor are equipped with, pressure gauges. As such, compliance monitoring has been revised to be consistent with the original conditional major permit to require daily filter inspection monitoring and recordkeeping, Such monitoring, along with qualitative visual observation of opacity as specified in the permit, and related record keeping, shall ensure compliance with the proper operation of the control equipment and the emission limitations specified in the permit.

Title V Permit - Paint Recovery Concern Group

34. See comment 13 and the Division's response to comment 13.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.

ATTACHMENT B

Response to Comments

Comments on NRE Acquisition Co LLC – VMV Paducahbilt Draft Conditional major Air Quality Permit submitted by Kent Hall, Director – Quality, Environmental, Health & Safety.

SECTION / PAGE	CONCERN	CORRECTION / COMMENTS	ACTION PLANNED
ATTACHMENT A SUMMARY			
2	SOURCE DESCRIPTION: PARA 1, OWNERSHIP CHANGE IN 2003	SHOULD BE JULY 1ST, 2002	REQUEST STATE TO REVISE
STATEMENT OF BASIS SECTION			
1	SOURCE DESCRIPTION: PARA 1, OWNERSHIP CHANGE IN 2003	SHOULD BE JULY 1ST, 2002	REQUEST STATE TO REVISE
6	ITEM B - WEEKLY OPACITY?	SHOULD BE MONTHLY	REQUEST STATE TO REVISE
6	ITEM D - WHAT IS E06??? ROTOBlast??? NOT SURE ABOUT THE ABILITY TO VISUALLY INSPECT	Not sure on this one. You need to get clarification from Rick.	REQUEST CLARIFICATION
PERMIT DETAILS			
2 of 61	Control efficiency - 0.25 lbs PM captured/lb PM used	S/B "Control efficiency - 0.75 lbs PM captured/lb PM used"	REQUEST STATE TO REVISE
7 of 61	1.c (0.7 psi and 0.11 psi).	S/B (0.07 ...	REQUEST STATE TO REVISE - TYPO IN FORMULA
8 of 61	4.b once each 8 hours of operation	currently once per shift	SHOULD BE REVISED TO READ ONCE PER SHIFT WHEN OPERATED
12 of 61	AP-42 Emission Factor-38.4 lbs pf PM/1000 lbs	Typo plus This factor is higher than the 9.6 lbs/1000 lbs used in our calculations on the PM tab of the monthly report.	REQUEST STATE TO REVISE
14 of 61	4.b b. The monthly VOC, PM, NOx and HAP emission shall be monitored in accordance with this section	Delete- Not required for any other natural gas emission point. Probable carry-over from when unit was diesel fired.	REQUEST STATE TO REVISE
16 of 61	2.a based on a three-hour average.	New Requirement	REQUEST STATE TO REVISE - OPERATES ON NATURAL GAS ONLY
16 OF 61	2.C. SO2 EMISSIONS?	This is a standard requirement in KAR 59:015 but I think that at one point the boilers were also permitted for diesel as an alternate fuel so it may be a hold-over. Not an issue with natural gas. The compliance demonstration method on the next page takes care of this.	REQUEST STATE TO REVISE - NATURAL GAS ONLY
16 OF 61	MONTHLY CALC FOR EMISSIONS LIMIT NEEDED FOR EP08?	No. I did not see this.	WHY WOULD THIS CHANGE? REQUEST STATE TO REVISE TO PREVIOUS REQUIREMENT - ANY OFFLINE HOURS ARE REPORTED DURING COMPLIANCE CERT - otherwise, units are in "operating" mode
19 of 61	PM emitted= S x TE x (1-CE)	PM emitted= S x (1-TE) x (1-CE) The formula in the draft uses the amount of paint applied to the object painted as the amount emitted. Needs to be corrected as shown.	REQUEST STATE TO REVISE

SECTION / PAGE	CONCERN	CORRECTION / COMMENTS	ACTION PLANNED
19 of 61	Formula includes paint recovery for this point.	This will require segregation of Paint waste by booth and will require sampling of waste from each area separately. Greatly increases costs.	REQUEST STATE TO REVISE - SHOULD BE AS BEFORE
19 of 61	Control efficiency – 0.999 lbs of PM	Control efficiency – 0.9 lbs of PM Formula in draft uses CE for new booth for waterwall.	REQUEST STATE TO REVISE
20 of 61	5.a If the booth is not in operation during a given time period this fact should be noted.	May want clarification on this	REQUEST STATE TO CLARIFY - BOOTH HAS NOT BEEN OPERATED IN MANY YEARS
22 of 61	PM emitted= S x TE x (1-CE)	PM emitted= S x (1-TE) x (1-CE) The formula in the draft uses the amount of paint applied to the object painted as the amount emitted. Needs to be corrected as shown.	REQUEST STATE TO REVISE
25 OF 61	5.b maintain records on all maintenance and any necessary repairs to the equipment.	New Requirement Not sure why they added this	REQUEST STATE TO REVISE TO READ AS BEFORE
28 OF 61	PM, NOX ??? (4. Specific Monitoring Requirements)	These are related to the burners on the ovens. The monitoring requirements should be the same as EP-08	REQUEST STATE TO REVISE
29 OF 61	SHOULD 5 A BE WEEKLY OR MONTHLY???	Verbage in draft is from last version. Should be changed to monthly	REQUEST STATE TO REVISE
31 OF 61	PM Calculation waste recovery	Waste portion of calculation needs to be deleted.	REQUEST STATE TO REVISE
31 OF 61	PM emitted= S x TE x (1-CE)	PM emitted= S x (1-TE) x (1-CE) The formula in the draft uses the amount of material applied to the object as the amount emitted. Needs to be corrected as shown.	REQUEST STATE TO REVISE
32 OF 61	Construction projected:	Unit has been installed should be "Construction Date:"	REQUEST STATE TO REVISE
33 OF 61	PM emitted= S x TE x (1-CE)	PM emitted= S x (1-TE) x (1-CE) The formula in the draft uses the amount of material applied to the object as the amount emitted. Needs to be corrected as shown.	REQUEST STATE TO REVISE
33 OF 61	4. Specific Monitoring Requirements: and 5. Specific Recordkeeping Requirements	Should read the same as sections 4 and 5 from EP-25	REQUEST STATE TO REVISE
36 OF 61	PM emitted= S x TE x (1-CE)	PM emitted= S x (1-TE) x (1-CE) The formula in the draft uses the amount of material applied to the object as the amount emitted. Needs to be corrected as shown.	REQUEST STATE TO REVISE
36 OF 61	Specific Monitoring Requirements 4.d	This requires inspection once per shift should read once per shift when in operation.	REQUEST STATE TO REVISE
36 OF 61	Specific Recordkeeping Requirements 5.b	This section requires a log of qualitative visible emission observations required by previous section 4. but the previous section does not specify the observations	REQUEST STATE TO CLARIFY
38 OF 61	SHOULD HAVE BEEN DELETED!!!!	Yes	REQUEST STATE TO REVISE
41 of 61	EP-25 description references Devilbis guns, but specifies the application rate for the Graco guns	need to enter either the 14 gph for devilbis or change to graco	REQUEST STATE TO REVISE TO PROPER GUN - DEVILBLIS HVLP @ 14 GPH
42 of 61	PM emitted= S x TE x (1-CE)	PM emitted= S x (1-TE) x (1-CE) The formula in the draft uses the amount of material applied to the object as the amount emitted. Needs to be corrected as shown.	REQUEST STATE TO REVISE
42 of 61	Specific Monitoring Requirements 4.b	This requires inspection once per shift should read once per shift when in operation.	REQUEST STATE TO REVISE
47 of 61	Individual HAP calculation for welding in Section D multiplies the control efficiency (CE) times the emission factor and the weight of material used.	The calculation for welding emissions in Section D should use (1-CE) as indicated for EP06 in Section B.	REQUEST STATE TO REVISE
48 of 61	EFj = natural gas combustion AP-42 emission factor – Formaldehyde 0.075 lbs of formaldehyde/lb of HAP generated. Hexane 1.8 lbs of hexane/106 ft3 of natural gas fired	EFj = natural gas combustion AP-42 emission factor – Formaldehyde 0.075 lbs of formaldehyde/106 ft3 of natural gas fired	REQUEST STATE TO REVISE
49	5.c. remove EP24		REQUEST STATE TO REVISE
49	5.o. Gallons or cans	SHOULD BE cans	REQUEST STATE TO REVISE
51 of 61	The statement of basis removed CO limits, but Section D requires recordkeeping and reporting of CO in Sections 5 and 6.	Confirm if documentation is still needed to be maintained for CO even though there is no limit.	REQUEST STATE TO CLARIFY - DO WE STILL NEED TO TRACK & REPORT???

SECTION / PAGE	CONCERN	CORRECTION / COMMENTS	ACTION PLANNED
VISIBLE EMISSIONS OPACITY MONITORING CONCERN GROUP			
5 OF 61	A - OPACITY	N/A	DROP FROM PERMIT - EP03 DOES NOT EXHAUST
5 OF 61	Compliance Demonstration Method- 2.a	New Requirement	DROP FROM PERMIT - EP03 DOES NOT EXHAUST
10 of 61	Compliance Demonstration Method- 2.a	New Requirement	REQUEST TO BE REVISED AS STATED ON PREVIOUS PERMIT
11 of 61	5.d weekly visible emission observations	New Requirement	REQUEST TO BE REVISED AS STATED ON PREVIOUS PERMIT
12 of 61	4.b.ii list of all individuals that monitor visible emissions	As written, this will require listing of operators who make the visible emission observations in addition to the Method 9 individuals previously tracked.	REQUEST STATE TO REVISE - LIST ONLY METHOD 9 INDIVIDUALS AS BEFORE
18/21 OF 61	OPACITY? VISUAL?	New Requirement Not sure why they added this	REQUEST STATE TO REMOVE
20 of 61	5.b weekly qualitative visible emission observations	New Requirement Not sure why they added this	REQUEST STATE TO REVISE
22/23 of 61	6. Specific Reporting Requirements:	The requirements here are more strict than previous. Need to report actions taken and cause. Although the investigations should not have to be conducted, if they do than you need to remember them. Possibly may want to generate a Opacity response checklist to make sure you capture the new requirements.	WHY WOULD THIS CHANGE? REQUEST STATE TO REVISE TO PREVIOUS REQUIREMENT
22 of 61	5.b weekly qualitative visible emission observations	New Requirement Not sure why they added this	REQUEST STATE TO REVISE
30 OF 61	Compliance Demonstration Method b. qualitative visual observation of the opacity of emissions from each unit on a weekly basis and maintain a log of the observations.	New Requirement Not sure why they added this	REQUEST STATE TO REVISE
31 OF 61	OPACITY? VISUAL?		REQUEST STATE TO REVISE
31 OF 61	6. Specific Reporting Requirements:	The requirements here are more strict than previous. Need to report actions taken and cause. Although the investigations should not have to be conducted, if they do than you need to remember them. Possibly may want to generate a Opacity response checklist to make sure you capture the new requirements.	REQUEST STATE TO REVISE
33 OF 61	Compliance Demonstration Method b. qualitative visual observation of the opacity of emissions from each unit on a weekly basis and maintain a log of the observations.	New Requirement Not sure why they added this	REQUEST STATE TO REVISE
41 of 61	OPACITY? VISUAL?		REQUEST STATE TO REVISE
41 of 61	Compliance Demonstration Method b. qualitative visual observation of the opacity of emissions from each unit on a weekly basis and maintain a log of the observations.	New Requirement Not sure why they added this	REQUEST STATE TO REVISE

SECTION / PAGE	CONCERN	CORRECTION / COMMENTS	ACTION PLANNED
PRESSURE DROP MONITORING CONCERN GROUP			
6 31 OF 61	ITEM C - DETERMINE IF PRESSURE DROP GAGES NEEDED ON EP20 AND EP25 PRESSURE DROP RECORDS	Need to talk to the state since there were no guages on the units from the manufacturer, there is nothing to compare to. Possibly suggest removal of the requirement. Are there guages?	REQUEST STATE TO REVISE - REMOVE FROM PERMIT - INSTRUMENTS NOT IN DESIGN FROM OEM NOT A DESIGN FEATURE FROM OEM -
33 OF 61	4.a log of the pressure drop readings	Is there a guage?	REQUEST STATE TO REVISE - REMOVE FROM PERMIT - INSTRUMENTS NOT IN DESIGN FROM OEM
41 of 61	Operating Limitations a. specifies a guage	Need to verify that there is a guage or remove requirement	REQUEST STATE TO REVISE - REMOVE FROM PERMIT - INSTRUMENTS NOT IN DESIGN FROM OEM
PAINT RECOVERY CONCERN GROUP			
22 of 61	Formula includes paint recovery for this point.	This will require segregation of Paint waste by booth and will require sampling of waste from each area seperately. Greatly increases costs.	REQUEST STATE TO REVISE - SHOULD BE AS BEFORE
33 OF 61	Formula includes paint recovery for this point.	This will require segregation of Paint waste by booth and will require sampling of waste from each area seperately. Greatly increases costs.	REQUEST STATE TO REVISE - SHOULD BE AS BEFORE
36 OF 61	Formula includes paint recovery for this point.	This will require segregation of Paint waste by booth and will require sampling of waste from each area seperately. Greatly increases costs.	REQUEST STATE TO REVISE - SHOULD BE AS BEFORE
46 of 61	PM calculation includes subtraction for waste collected, but the individual calculations in Section B subtract them from each point.	Double dipping benefits VMV but may present long-term problem.	REQUEST STATE TO REMOVE PM ASPECTS FOR WASTE RECOVERY - NO VALUE ADDED AS-IS. ONLY NEEDED FOR VOC/HAPS REDUCTIONS